



**Columbia University**

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Secretary of Transportation  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590  
Attn: Blane A. Workie, Assistant General Counsel for Aviation Enforcement Proceedings

Re: Submission in *NABR v. United Airlines et al.* Docket No. DOT-OST-2018-0124

Dear Madam Secretary:

We are submitting this letter to provide the Department of Transportation (DOT) with information that may be relevant to its evaluation of the above referenced complaint, which alleges that various airlines refuse to carry animals for critical biomedical research, but carry them for other purposes.

Columbia University has a long history of contributing to important breakthroughs in medicine and science, and animal-based research has been the foundation of many of these medical advances. The University has over 300 principal investigators working with laboratory animals. Major programs using laboratory animals include: biochemistry and molecular biology, dental medicine, genetics and development, cancer, cardiology, infectious diseases, endocrinology, immunology, ophthalmology, transplantation surgery, microbiology, and pharmacology. Many of the programs are federally funded (NIH, NSF, DOD, etc.) and utilize animal models. Access to the appropriate models are essential for making life-changing discoveries, especially for serious diseases and conditions such as cancer, heart disease, Parkinson's and diabetes.

Researchers must rely on live-animal research to safely develop treatments for both people and animals alike. Access to live-animal subjects is required in order to conduct this revelatory



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work. At the same time, current laws and regulations mandate this kind of research before life-saving medicines and treatments may be approved for use in humans.

According to the complaint, many airlines refuse to transport animals for these vital scientific discoveries, although the airlines will transport the same animals for non-research purposes, such as for zoos or as pets. We believe that as long as the government requires this research, it should also enforce its laws in a way that does not undermine these essential research requirements. This arbitrary delineation by the airlines - which we understand has no transportation related purpose - threatens the progress of key research, research which could reduce or even eradicate diseases.

We urge the DOT to investigate the complaint filed by NABR and to require all airlines to eliminate policies which discriminate against animal carriage and instead base carriage solely on the fact that the purpose of the transportation of animals is for legal, legitimate, necessary and essential life-saving biomedical research. We respectfully request that DOT take these actions to ensure the continued progress of essential medical research.

Sincerely,

Brian Karolewski